

**From:** Randall Garteiser rgarteiser@ghiplaw.com

**Subject:** Re: Today's deadlines in Valve cases

**Date:** April 19, 2024 at 12:38 PM

**To:** Machleidt, Dario dmachleidt@ktslaw.com

**Cc:** Geyer, Kate KGeyer@ktslaw.com, Shaun Hassett shaunhassett@potterminton.com, Jessica.kaempf.opposing.counsel.gearbox Kaempf jkaempf@fenwick.com, Michael Sacksteder msacksteder@fenwick.com, Hannah Reid HReid@fenwick.com, Mike Jones mikejones@potterminton.com, Damitio, Chris CDamitio@ktslaw.com

RG

Okay, thanks for following up. Yes, let's talk at 3 pm Central, 1 pm Pacific. We can use this call-in number.

(903)284-5200,103#,5667#  
3 pm Central, 1 pm Pacific

Below was the proposed stipulation I was referring too. I sent it to everyone after our last meet and confer on April 8, 2024.

**Revised Draft Joint Stipulation Text for Valve's Consideration**

Whereas, the parties have entered into an Order controlling venue discovery in defendant Valve Corporation cases pending in this district involving three patent asset management subsidiaries, Symbology, QTI and SPIS;

Whereas, judicial economy is served by the Court ruling on Valve's Rule 12(b)(3) motion in the first filed case, Symbology v. Valve, as opposed to all three cases;

Whereas, the parties agree the decision in the Symbology v Valve case on the issued of venue being proper under Rule 12(b)(3) will be dispositive in all three cases;

Whereas, plaintiff agrees it will not challenge on appeal a decision on the Court's ruling on Valve's Rule 12(b)(3) motion;

Whereas, the parties agree to suspend briefing on the motions in QTI and SPIS to avoid escalation of amending complaints under the general rule in this district that amendments to pleadings should be readily granted to promote resolution on the merits;

Whereas, the parties have agreed to delay setting deposition dates and source code review in the Symbology case until August 1, 2024;

Whereas, the parties have agreed to delay setting depositions dates and source code review in the QTI and SPIS case until October 1, 2024;

Whereas, the parties agree to re-visit this stipulation and proposed order on or about August 1, 2024, if the Court has not ruled on the Rule 12(b)(3) motion by August 1, 2024;

Whereas, Plaintiff agrees that it will file a response to Valve Corporation's pending motion to dismiss pursuant to Rule 12(b)(3) no later than April 22, 2024, in the leading Symbology Innovations v. Valve Corp. litigation.



Re/ SPIS v.  
Valve -...il 8.eml

On Apr 18, 2024, at 7:58 PM, Machleidt, Dario <dmachleidt@ktslaw.com> wrote:

Randy,

You never responded to Kate's email. We're available to meet and confer tomorrow morning. As we've repeatedly said, it's unclear what you're proposing.

We do not consider the parties to have met and conferred until we talk.

Sincerely,